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Web Hosting

Over the years, web hosting service providers have expanded their product offerings to meet the demands of the ever-growing and evolving online community. It is interesting that the E-Rate program was founded on providing access and the proposed changes to web hosting are actually restricting the schools' and libraries' abilities to provide access to others to the resources they have available on their servers. Effective school & library web sites provide resources of the institution for the parents, patrons, and community as a whole. Information sharing is a key concept in the No Child Left Behind (NCLB) legislation that requires the school technology plans to include steps to increase access to educational technology, coordination with other resources, parental involvement, collaboration with adult literacy service providers, and innovative delivery strategies.

We understand that the universal service funds should not be used to pay for educational content nor for the costs of content creation. However web hosting services such as tools for creation of web pages and content editing features should be eligible as these services provide the means for a school or library to "display content on the Internet." To deny funding for these services is similar to providing funding for email but denying funding for inherent email features such as address books, spell checking, formatting text, signature files, and filing features included as a part of the email program. In fact, web hosting services costing less than \$10.00/month such as GoDaddy and 1and1.com already include content editing tools at their most basic level of service.

As demand increases for schools and libraries to create web sites that are easy to navigate, media-rich, and provide the information required to interact with the communities they serve, tools for content creation and content editing features are evolving into an inherent part of the minimal services needed. Therefore, we recommend that the definition of web hosting funding be changed as follows:

"The following web hosting functions are eligible for discount:

- Provision of web site traffic (bandwidth)**
- Provision of disk space for storing applicant provided content**
- Provision of File Transfer Protocol (FTP) transfer or a Web interface to upload files**
- Tools for content creation**
- Content editing features**

Software applications not used for the explicit purpose of tools for content creation, storage of end-user files that are not a part of the applicant provided content, charges for creation of content, and charges for use of content are not eligible for funding.

Any cost allocation must be based on tangible information that provides a reasonable and appropriate delineation between the eligible and ineligible components.

Respectfully Submitted,

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